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U.S. BANKRUPTCY COURT  
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) S.D. OF N.Y.

) INDEX NO. 23-11805

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) NOTICE OF MOTION

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Paul Mc

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To: Steven Mostofsky, Karen Sager Goldberg, Edwin Williams, Rachel Adams, Robert Ugelow via e-mail and U.S. mail.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN THE MATTER OF ) INDEX NO. 23-11805  
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RAHUL MANCHANDA ) AFFIRMATION IN SUPPORT  
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STATE OF NEW YORK            }  
                                  : ss  
COUNTY OF WESTCHESTER        }

RAHUL MANCHANDA, an Attorney duly licensed to practice law in the State of New York, affirms the following to be true under penalty of perjury:

1. I make this Affirmation in support of this Motion for Contempt of Court against Defendants in all respects based upon my personal knowledge of the facts and experiences that I relate herein, based upon information and belief, and based on the contents of the file.
2. On the grounds that these people continue to willfully fail to comply with this Honorable Bankruptcy Court through the Automatic Stay pursuant to 11 U.S.C. § 362 and Protection of this Honorable Court by continuing to engage in threatening, harassing, intimidating, litigating, and violating federal

bankruptcy protection and the stay;

2. On the grounds that even though these individuals repeatedly received written and electronic Notice of Chapter 7 Bankruptcy Filings on February 5, 2023 (chapter 7 case 23-22095), as well as November 2023 (chapter 7 case 23-11805) they continue to ignore these notifications, conducting hearings demanding a case file for former client Edwin Williams even though Debtor has a retaining for outstanding legal fees of more than \$6500, since turned over to Trustee Salvatore Lamonica after having been placed with IC Collections and Cedar Financial collection agencies, as part of the bankruptcy estate, and Debtor has been advised by Trustee Salvatore LaMonica that he is not to dispose of or release anything of financial value if it's part of the bankruptcy estate.
3. However, the above named individuals ignore this federal bankruptcy stay and continue with their threatening, harassing, intimidating, and litigating in Kings County Matrimonial Court index no 551684/2020 even though Debtor has not been the attorney of record for more than 1 year now, having agreed to a substitution of counsel;
4. Now these people demand that Debtor attend a court date on January 12, 2023 at Kings County Matrimonial Court and turn

over property valued at more than \$6500 that has been vested/turned over to the Trustee;

5. Nothing less than sanctions, penalties, fines, and incarceration will persuade these crazed Defendants to comply with this Honorable Court's Automatic Stay and Protection from continuing to engage in threatening, harassing, intimidating, litigating, collecting, and violating federal bankruptcy protection and the stay;
6. If Defendants are not forced to comply with this Honorable Court's Automatic Stay and Protection from continuing to engage in threatening, harassing, intimidating, litigating, collecting, and violating federal bankruptcy protection and the stay, then these people will have reduced federal bankruptcy protection to a shambles;
7. Defendants' willful and intentional noncompliance with the Automatic Stay and Protection prohibiting their continuing to engage in threatening, harassing, intimidating, litigating, collecting, violating federal bankruptcy protection and the stay, and otherwise aggressive disregard for federal bankruptcy protection of this Honorable Court have defeated, impaired, impeded, and prejudiced Debtor's rights;

8. And for such other further relief as this Honorable Court deems just and proper, including contempt, costs, penalties, fines, incarceration, and sanctions against Defendants for willful violations of U.S. Federal Bankruptcy Law, willful violations of the Stay pursuant to 111 U.S.C. § 362, and in light of the information contained herein.

**WHEREFORE**, it is respectfully requested that this Motion be granted in all respects together with such other and further relief as this Honorable Court deems to be just and proper, including contempt, costs, penalties, fines, incarceration, and sanctions against Defendants for violation of U.S. Federal Bankruptcy Law, willful violations of the Stay pursuant to 111 U.S.C. § 362, and in light of the information contained herein.

**Dated:** December 27, 2023  
New York, NY

  
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Rahul Manchanda

## CERTIFICATE OF SERVICE

On December 27, 2023, I, Rahul Manchanda, served a copy of this Motion for Contempt of Court and any attached pages to Steven Mostofsky, Karen Sager Goldberg, Edwin Williams, Rachel Adams, Robert Ugelow via e-mail and U.S. mail.



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